

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
Plaintiff,) Honorable Aleta A. Trauger
vs.) Magistrate Judge Jeffrey S. Frensley
CORRECTIONS CORPORATION OF)
AMERICA, et al.,) DEMAND FOR JURY TRIAL
Defendants.)

)

CORECIVIC'S UNOPPOSED MOTION FOR TWO EXCESS PAGES FOR ITS REPLY
BRIEF

Defendant CoreCivic, Inc. (“CoreCivic”) respectfully requests that the Court grant relief from the 5-page limit for its reply brief set forth in Local Rule 7.01(a), and allow CoreCivic to file a 7-page reply brief in further support of CoreCivic’s Motion to Determine Sufficiency of Responses to CoreCivic’s First Set of Requests for Admission and Compel Further Responses to CoreCivic’s First Set of Requests for Admission and Second Set of Interrogatories (ECF No. 250). Pursuant to the Court’s July 16, 2020 Order, “[r]esponses and replies shall be filed in accordance with Rule 7.01(a).” ECF No. 244. Rule 7.01(a) in turn provides that an “optional reply memorandum may be filed within seven (7) days after service of the response, and shall not exceed (5) pages without leave of Court.” M.D. Tenn. L.R. 7.01(a).

Lead Plaintiff Amalgamated Bank’s (“Plaintiff”) response brief raises new arguments that were not raised in the parties’ meet and confers. Specifically, Plaintiff argues for the first time that it is not required to respond to certain discovery requests based on CoreCivic’s own statements, that Plaintiff lacks sufficient information to respond to CoreCivic’s discovery requests, and that CoreCivic’s discovery requests cannot be answered as phrased. *See generally* Opp., ECF No. 262. Plaintiff also advances for the first time new explanations for its deficient responses not raised during meet and confers. *See, e.g., id.* at 17–18. CoreCivic thus respectfully requests a modest two-page extension to the 5-page limit set forth in Local Rule 7.01(a) to address these new arguments and explanations. Given time constraints and the complexity of the issues, CoreCivic is concurrently filing its proposed 7-page reply brief and supporting declaration and exhibits.

CoreCivic’s counsel has conferred with Plaintiff’s counsel regarding this extension and Plaintiff’s counsel does not oppose this request. A proposed order is attached as an exhibit hereto.

DATED: August 17, 2020

Respectfully submitted:

/s/ Steven A. Riley

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CERTIFICATE OF SERVICE

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this 17th day of August, 2020.

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